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*Proposed Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
NATIONAL REALTY INVESTMENT ADVISORS, LLC,	Case No. 22-14539 (JKS)
Debtor.	
In re:	Chapter 11
142 NE 7 TH CAPITAL, LLC	Case No. 22-14542 (JKS)
Debtor.	
In re:	Chapter 11
143 ADAGIO INVESTMENTS LLC,	Case No. 22-14543 (JKS)
Debtor.	
In re:	Chapter 11
184 LINCOLN PLACE LP,	Case No. 22-14545 (JKS)
Debtor.	
In re:	Chapter 11
1ST AVENUE CAPITAL 301, LLC	Case No. 22-14546 (JKS)
Debtor.	

In re: 2031 LOMBARD PARTNERS LLC, Debtor.	Chapter 11 Case No. 22-14548 (JKS)
In re: 2044 WEST FIRST CAPITAL LLC, Debtor.	Chapter 11 Case No. 22-14550 (JKS)
In re: 3RD STREET CAPITAL 200-210 LLC, Debtor.	Chapter 11 Case No. 22-14551 (JKS)
In re: 3RD STREET CAPITAL 203-215 LLC, Debtor.	Chapter 11 Case No. 22-14553 (JKS)
In re: 51ST STREET CAPITAL 508 LLC, Debtor.	Chapter 11 Case No. 22-14555 (JKS)
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In re: ADAM ST CAPITAL 6903 LLC, Debtor.	Chapter 11 Case No. 22-14560 (JKS)
In re: ADAM ST CAPITAL 6903 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14561 (JKS)
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In re: BERGEN ST CAPITAL 1070 LLC, Debtor.	Chapter 11 Case No. 22-14566 (JKS)
In re: BERGENLINE CAPITAL 4901 LLC, Debtor.	Chapter 11 Case No. 22-14568 (JKS)
In re: BERKELEY PLACE CAPITAL 227 LLC, Debtor.	Chapter 11 Case No. 22-14570 (JKS)

In re: BLACK HORSE ALLEY CAPITAL, Debtor.	Chapter 11 Case No. 22-14571 (JKS)
In re: BOND WAY CAPITAL 915 LLC, Debtor.	Chapter 11 Case No. 22-14572 (JKS)
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In re: CULVER URBAN RENEWAL REDEVELOPMENT I, LLC Debtor.	Chapter 11 Case No. 22-14579 (JKS)
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In re: DEGRAW ST CAPITAL 377 LLC, Debtor.	Chapter 11 Case No. 22-14541 (JKS)
In re: DELRAY CAPITAL 1 LLC, Debtor.	Chapter 11 Case No. 22-14544 (JKS)
In re: DELRAY CAPITAL 1B LLC, Debtor.	Chapter 11 Case No. 22-14547 (JKS)
In re: DENERY LANE CAPITAL 837 LLC, Debtor.	Chapter 11 Case No. 22-14549 (JKS)
In re: DENERY LANE CAPITAL 843 LLC, Debtor.	Chapter 11 Case No. 22-14552 (JKS)
In re: DENERY LANE CAPITAL 843 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14554 (JKS)
In re: ELDEN DRIVE CAPITAL 1 LLC, Debtor.	Chapter 11 Case No. 22-14557 (JKS)

In re: FEDERAL HIGHWAY CAPITAL 318 B LLC, Debtor.	Chapter 11 Case No. 22-14559 (JKS)
In re: FEDERAL HIGHWAY CAPITAL 318 LLC, Debtor.	Chapter 11 Case No. 22-14562 (JKS)
In re: FTM PARTNERS PORTFOLIO HOTEL RETAIL LLC, Debtor.	Chapter 11 Case No. 22-14564 (JKS)
In re: FTM PARTNERS PORTFOLIO MARINA LLC, Debtor.	Chapter 11 Case No. 22-14567 (JKS)
In re: FTM PARTNERS PORTFOLIO RESTAURANT LLC, Debtor.	Chapter 11 Case No. 22-14569 (JKS)
In re: GULF STREAM VIEWS II LLC, Debtor.	Chapter 11 Case No. 22-14573 (JKS)
In re: GULF STREAM VIEWS LLC, Debtor.	Chapter 11 Case No. 22-14575 (JKS)

In re: GUTTENBERG CAPITAL 416-22 69TH ST LLC, Debtor.	Chapter 11 Case No. 22-14578 (JKS)
In re: GUTTENBERG CAPITAL 6269 LLC, Debtor.	Chapter 11 Case No. 22-14580 (JKS)
In re: HANOVER ROAD CAPITAL 2 LLC, Debtor.	Chapter 11 Case No. 22-14582 (JKS)
In re: HENRY STREET CAPITAL 506, LLC Debtor.	Chapter 11 Case No. 22-14583 (JKS)
In re: KENWOOD RD CAPITAL 8 LLC, Debtor.	Chapter 11 Case No. 22-14584 (JKS)
In re: LANDNET LLC, Debtor.	Chapter 11 Case No. 22-14586 (JKS)
In re: LENDER PRIME 1 LLC, Debtor.	Chapter 11 Case No. 22-14585 (JKS)

In re: LUQUER STREET CAPITAL 140 LLC, Debtor.	Chapter 11 Case No. 22-14587 (JKS)
In re: MADISON STREET CAPITAL 931 LLC, Debtor.	Chapter 11 Case No. 22-14588 (JKS)
In re: MAIN ST. CAPITAL 360 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14592 (JKS)
In re: MAIN ST. CAPITAL 360 LLC, Debtor.	Chapter 11 Case No. 22-14590 (JKS)
In re: MAIN ST. CAPITAL 360 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14594 (JKS)
In re: MANHATTAN AVENUE CAPITAL 1300 LLC, Debtor.	Chapter 11 Case No. 22-14596 (JKS)
In re: N. OCEAN CAPITAL 2929 B LLC, Debtor.	Chapter 11 Case No. 22-14597 (JKS)

In re: N. OCEAN CAPITAL 3565 B LLC, Debtor.	Chapter 11 Case No. 22-14601 (JKS)
In re: N. OCEAN CAPITAL 707 B LLC, Debtor.	Chapter 11 Case No. 22-14603 (JKS)
In re: N. OCEAN CAPITAL 344 LLC, Debtor.	Chapter 11 Case No. 22-14599 (JKS)
In re: N. OCEAN CAPITAL 707 LLC, Debtor.	Chapter 11 Case No. 22-14605 (JKS)
In re: NEWARK STREET CAPITAL 511-521 LLC, Debtor.	Chapter 11 Case No. 22-14607 (JKS)
In re: NJ MANAGER 1300, LLC, Debtor.	Chapter 11 Case No. 22-14609 (JKS)
In re: NORTH BERGEN CAPITAL 8709 LLC, Debtor.	Chapter 11 Case No. 22-14610 (JKS)

In re: NRIA 140 LUQUER MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14612 (JKS)
In re: NRIA 1ST AVENUE 301 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14614 (JKS)
In re: NRIA 2031 LOMBARD MANAGER, Debtor.	Chapter 11 Case No. 22-14616 (JKS)
In re: NRIA 2044 WEST FIRST CAPITAL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14618 (JKS)
In re: NRIA 2044 WEST FIRST CAPITAL MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14589 (JKS)
In re: NRIA 227 BERKELEY MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14591 (JKS)
In re: NRIA 279 SACKETT MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14593 (JKS)

In re: NRIA 3RD STREET CAPITAL 200-210 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14595 (JKS)
In re: NRIA 3RD STREET CAPITAL 200-210 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14598 (JKS)
In re: NRIA 3RD STREET CAPITAL 203-215 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14600 (JKS)
In re: NRIA 3RD STREET CAPITAL 203-215 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14602 (JKS)
In re: NRIA 423 THIRD MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14604 (JKS)
In re: NRIA 434 UNION MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14606 (JKS)
In re: NRIA 494 SEVENTH MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14608 (JKS)

In re: NRIA 51ST STREET 508 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14611 (JKS)
In re: NRIA 51ST STREET MANAGER 508 LLC, Debtor.	Chapter 11 Case No. 22-14613 (JKS)
In re: NRIA 52ND STREET 511-513 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14615 (JKS)
In re: NRIA 7TH STREET CAPITAL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14617 (JKS)
In re: NRIA BERGENLINE 4901 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14619 (JKS)
In re: NRIA BOND WAY CAPITAL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14620 (JKS)
In re: NRIA BRINY CAPITAL 305 MANAGER, LLC, Debtor.	Chapter 11 Case No. 22-14623 (JKS)

In re: NRIA BRINY CAPITAL 305 MEMBER, LLC, Debtor.	Chapter 11 Case No. 22-14625 (JKS)
In re: NRIA BROOKLYN I, LLC Debtor.	Chapter 11 Case No. 22-14627 (JKS)
In re: NRIA BROOKLYN II, LLC Debtor.	Chapter 11 Case No. 22-14629 (JKS)
In re: NRIA CHERRY STREET 113-27 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14621 (JKS)
In re: NRIA DELRAY 1 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14622 (JKS)
In re: NRIA DENERY LANE CAPITAL 837 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14624 (JKS)
In re: NRIA EB5 1300 MANHATTAN FUND LLC, Debtor.	Chapter 11 Case No. 22-14626 (JKS)

In re: NRIA EB5 4901 BERGENLINE FUND LLC, Debtor.	Chapter 11 Case No. 22-14628 (JKS)
In re: NRIA ELDEN DRIVE 1 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14630 (JKS)
In re: NRIA EXCHANGE, LLC Debtor.	Chapter 11 Case No. 22-14631 (JKS)
In re: NRIA FEDERAL HIGHWAY 318 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14632 (JKS)
In re: NRIA FL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14633 (JKS)
In re: NRIA GULF STREAM VIEWS MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14635 (JKS)
In re: NRIA GUTTENBERG CAPITAL 416-22 69TH ST MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14637 (JKS)

In re: NRIA GUTTENBERG CAPITAL 416-22 69TH ST MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14639 (JKS)
In re: NRIA GUTTENBERG CAPITAL 6269 JV MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14641 (JKS)
In re: NRIA GUTTENBERG CAPITAL 6269 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14643 (JKS)
In re: NRIA HANOVER ROAD MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14645 (JKS)
In re: NRIA HENRY STREET 506 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14646 (JKS)
In re: NRIA II, Debtor.	Chapter 11 Case No. 22-14648 (JKS)
In re: NRIA KENWOOD RD 8 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14650 (JKS)

In re: NRIA MADISON STREET CAPITAL 931 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14651 (JKS)
In re: NRIA MANHATTAN AVENUE 1300 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14653 (JKS)
In re: NRIA N. OCEAN 2929 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14655 (JKS)
In re: NRIA N. OCEAN 344 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14634 (JKS)
In re: NRIA N. OCEAN 3565 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14636 (JKS)
In re: NRIA N. OCEAN 707 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14638 (JKS)
In re: NRIA NE 7TH MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14640 (JKS)

In re: NRIA NEWARK STREET CAPITAL 511 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14642 (JKS)
In re: NRIA NEWARK STREET CAPITAL 511-521 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14644 (JKS)
In re: NRIA NJ MANAGER 511 LLC, Debtor.	Chapter 11 Case No. 22-14647 (JKS)
In re: NRIA NJ MANAGER 8709 LLC, Debtor.	Chapter 11 Case No. 22-14649 (JKS)
In re: NRIA NJ MANAGER 931 LLC, Debtor.	Chapter 11 Case No. 22-14652 (JKS)
In re: NRIA NORTH BERGEN 8709 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14654 (JKS)
In re: NRIA OLD RIVER RD CAPITAL 460-510 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14656 (JKS)

In re: NRIA OLD RIVER RD CAPITAL 460-510 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14657 (JKS)
In re: NRIA OLD WOODS ROAD MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14658 (JKS)
In re: NRIA PARTNERS PORTFOLIO FUND I, LLC, Debtor.	Chapter 11 Case No. 22-14540 (JKS)
In re: NRIA SOUTH CHRISTOPHER COLUMBUS 1499 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14659 (JKS)
In re: NRIA STRUCTURED CREDIT STRATEGIES LLC, Debtor.	Chapter 11 Case No. 22-14660 (JKS)
In re: NRIA WRIGHT BY THE SEA 1901 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14661 (JKS)

In re: OLD RIVER ROAD CAPITAL 460-510 LLC, Debtor.	Chapter 11 Case No. 22-14662 (JKS)
In re: OLD WOODS ROAD CAPITAL 36 LLC, Debtor.	Chapter 11 Case No. 22-14663 (JKS)
In re: SACKETT STREET CAPITAL 279 LLC, Debtor.	Chapter 11 Case No. 22-14664 (JKS)
In re: SEVENTH STREET CAPITAL 494 LLC, Debtor.	Chapter 11 Case No. 22-14665 (JKS)
In re: SOUTH CHRISTOPHER COLUMBUS CAPITAL 1499 LLC, Debtor.	Chapter 11 Case No. 22-14667 (JKS)
In re: SUMMIT STREET CAPITAL 143 LLC, Debtor.	Chapter 11 Case No. 22-14668 (JKS)
In re: THIRD STREET CAPITAL 423 LLC, Debtor.	Chapter 11 Case No. 22-14669 (JKS)

In re: UNION STREET CAPITAL 434 LLC, Debtor.	Chapter 11 Case No. 22-14670 (JKS)
In re: WEB MARKETING ASSOCIATES LLC, Debtor.	Chapter 11 Case No. 22-14671 (JKS)
In re: WRIGHT BY THE SEA 1901, LLC Debtor.	Chapter 11 Case No. 22-14672 (JKS)

**DEBTORS' MOTION FOR ENTRY OF AN ORDER (A) DIRECTING
JOINT ADMINISTRATION OF CHAPTER 11 CASES
AND (B) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors in possession (the “Debtors”) seek entry of an order, substantially in the form attached as Exhibit A, (a) directing procedural consolidation and joint administration of these chapter 11 cases, and (b) granting related relief. In support of this motion (the “Motion”), the Debtors submit the *Declaration in Support of Chapter 11 Petitions and First Day Pleadings* (the “First Day Declaration”), filed contemporaneously herewith, and respectfully state as follows:

BACKGROUND

1. On June 7, 2022 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”).
2. The Debtors are currently operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner. No official committee of unsecured creditors has been appointed.

3. Additional background surrounding the commencement of these Chapter 11 Cases is set forth in the First Day Declaration.

RELIEF REQUESTED

4. By this Motion, the Debtors seek entry of an order (a) directing procedural consolidation and joint administration of these Chapter 11 Cases, and (b) granting related relief. Specifically, the Debtors request that the United States Bankruptcy Court for the District of New Jersey (the “Court”) maintain one file and one docket for all of the jointly administered cases under the case of National Realty Investment Advisors, LLC, and that the cases be administered under a consolidated caption, as follows:

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
NATIONAL REALTY INVESTMENT ADVISORS, LLC, <i>et al.</i> ¹	Case No. 22-14539 (JKS)
Debtors.	(Jointly Administered)

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors’ service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

5. The Debtors further request that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors also request that a docket entry, substantially similar to the following, be entered on the dockets of all Debtors, other than Debtor National Realty Investment Advisors, LLC:

An order has been entered in this case consolidating this case with the case of National Realty Investment Advisors, LLC (Case No. 22-14539 (JKS)) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The

docket in Case No. 22-14539 (JKS) should be consulted for all matters affecting this case.

6. The Debtors will file consolidated monthly operating reports, but will separately set forth disbursements for each Debtor as a schedule to the extent required by the *United States Trustee Operating Guidelines*, with said reports to be filed in the lead case, rather than in each of the Debtor's individual cases.

7. Finally for purposes of efficiency and in order to streamline notice of all matters that may affect creditors of any of the Debtors, the Debtors request authority to file a single consolidated list of the 30 largest creditors in each of the Chapter 11 Cases.

JURISDICTION AND VENUE

8. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, entered on July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.).

9. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

10. The bases for the relief requested herein are section 105(a) of the Bankruptcy Code, rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**").

BASIS FOR RELIEF

11. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015. The Debtors are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code. As described in the First Day Declaration, the Debtors are a vertically-integrated development firm with dedicated fund management and luxury home sales and apartment rental divisions. Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein.

12. Section 105(a) of the Bankruptcy Code provides the Court with the power to grant the relief requested herein by permitting the Court to “issue any order, process, or judgment that

is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. §105(a).

11. Joint administration is generally non-controversial, and courts in this jurisdiction routinely order joint administration in cases with multiple, related debtors. *See, e.g., In re Duro Dyne Nat'l Corp.*, Case No. 18-27963 (MBK) (Bankr. D.N.J. Sept. 7, 2018); *In re RWRF, Inc.*, Case No. 17-32958 (JKS) (Bankr. D.N.J. Nov. 15, 2017); *In re Mountain Creek Resort, Inc.*, Case No. 17-19899; (SLM) (Bankr. D.N.J. May 17, 2017); *In re Cinram Group, Inc.*, Case No. 17-15258 (VFP) (Bankr. D.N.J. Mar. 24, 2017).

12. Given the integrated nature of the Debtors’ operations, joint administration of these Chapter 11 Cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these Chapter 11 Cases will affect all Debtor entities. The entry of an order directing joint administration of these Chapter 11 Cases will reduce fees and costs by avoiding duplicative filings and objections in each Debtor’s case. Joint administration also will allow the U.S. Trustee and all parties in interest to monitor these Chapter 11 Cases with greater ease and efficiency by allowing such parties to focus on one case docket.

13. Moreover, joint administration will not adversely affect the Debtors’ respective constituencies because this Motion seeks only administrative, not substantive, consolidation of the Debtors’ estates. Parties in interest will not be harmed by the relief requested; instead, parties in interest will benefit from the cost reductions associated with the joint administration of these Chapter 11 Cases. Accordingly, the Debtors submit that the joint administration of these Chapter 11 Cases is in the best interests of their estates, their creditors, and all other parties in interest.

WAIVER OF MEMORANDUM OF LAW

14. Because the legal and factual basis upon which the Debtors rely are incorporated herein and the Motion does not raise any novel issues of law, the Debtors

respectfully request that the Court waive the requirement to file a separate memorandum of law pursuant to D.N.J. LBR 9013-1(a)(3).

NO PRIOR REQUEST

15. No previous motion for the relief sought herein has been made to this or to any other court.

NOTICE

16. Notice of this Motion has been given to (i) the Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, NJ 07102; (ii) the Debtors' thirty largest unsecured creditors on a consolidated basis and the Debtors' thirty largest investors on a consolidated basis; (iii) S3 RE Bergenline Funding, LLC, S3 RE 1300 Manhattan Funding LLC and LendingOne LLC; (iv) the U.S. Attorney General; (v) the Internal Revenue Service; (vi) the Securities and Exchange Commission; (vii) the New Jersey Attorney General; (viii) the U.S. Attorney for the District of New Jersey; (ix) the New Jersey Division of Taxation; (x) the New Jersey Bureau of Securities; (xi) the New York Attorney General; (xii) the New York Department of Taxation and Finance; (xiii) the Florida Attorney General; (xiv) the Florida Department of Revenue; (xv) the Illinois Attorney General; (xvi) the Illinois Department of Revenue; (xvii) the Illinois Securities Department; (xviii) the Alabama Attorney General; (xix) the Alabama Department of Revenue; (xx) the Alabama Securities Commission; and (xxi) those parties who have filed a notice of appearance and request for service of pleadings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is required.

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CONCLUSION

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached as Exhibit A, granting the relief requested herein and such other relief as is just and proper.

Respectfully submitted,

Dated: June 8, 2022

SILLS CUMMIS & GROSS P.C.

/s/ S. Jason Teele
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Proposed Counsel to the Debtors and Debtors-in-Possession

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

SILLS CUMMIS & GROSS P.C.

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DISTRICT OF NEW JERSEY**

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NATIONAL REALTY INVESTMENT
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Debtor.

In re: Chapter 11

142 NE 7TH CAPITAL, LLC Case No. 22-14542 (JKS)

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In re: Chapter 11

143 ADAGIO INVESTMENTS LLC, Case No. 22-14543 (JKS)

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In re: DEGRAW ST CAPITAL 377 LLC, Debtor.	Chapter 11 Case No. 22-14541 (JKS)
In re: DELRAY CAPITAL 1 LLC, Debtor.	Chapter 11 Case No. 22-14544 (JKS)
In re: DELRAY CAPITAL 1B LLC, Debtor.	Chapter 11 Case No. 22-14547 (JKS)
In re: DENERY LANE CAPITAL 837 LLC, Debtor.	Chapter 11 Case No. 22-14549 (JKS)
In re: DENERY LANE CAPITAL 843 LLC, Debtor.	Chapter 11 Case No. 22-14552 (JKS)
In re: DENERY LANE CAPITAL 843 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14554 (JKS)
In re: ELDEN DRIVE CAPITAL 1 LLC, Debtor.	Chapter 11 Case No. 22-14557 (JKS)

In re: FEDERAL HIGHWAY CAPITAL 318 B LLC, Debtor.	Chapter 11 Case No. 22-14559 (JKS)
In re: FEDERAL HIGHWAY CAPITAL 318 LLC, Debtor.	Chapter 11 Case No. 22-14562 (JKS)
In re: FTM PARTNERS PORTFOLIO HOTEL RETAIL LLC, Debtor.	Chapter 11 Case No. 22-14564 (JKS)
In re: FTM PARTNERS PORTFOLIO MARINA LLC, Debtor.	Chapter 11 Case No. 22-14567 (JKS)
In re: FTM PARTNERS PORTFOLIO RESTAURANT LLC, Debtor.	Chapter 11 Case No. 22-14569 (JKS)
In re: GULF STREAM VIEWS II LLC, Debtor.	Chapter 11 Case No. 22-14573 (JKS)
In re: GULF STREAM VIEWS LLC, Debtor.	Chapter 11 Case No. 22-14575 (JKS)

In re: GUTTENBERG CAPITAL 416-22 69TH ST LLC, Debtor.	Chapter 11 Case No. 22-14578 (JKS)
In re: GUTTENBERG CAPITAL 6269 LLC, Debtor.	Chapter 11 Case No. 22-14580 (JKS)
In re: HANOVER ROAD CAPITAL 2 LLC, Debtor.	Chapter 11 Case No. 22-14582 (JKS)
In re: HENRY STREET CAPITAL 506, LLC Debtor.	Chapter 11 Case No. 22-14583 (JKS)
In re: KENWOOD RD CAPITAL 8 LLC, Debtor.	Chapter 11 Case No. 22-14584 (JKS)
In re: LANDNET LLC, Debtor.	Chapter 11 Case No. 22-14586 (JKS)
In re: LENDER PRIME 1 LLC, Debtor.	Chapter 11 Case No. 22-14585 (JKS)

In re: LUQUER STREET CAPITAL 140 LLC, Debtor.	Chapter 11 Case No. 22-14587 (JKS)
In re: MADISON STREET CAPITAL 931 LLC, Debtor.	Chapter 11 Case No. 22-14588 (JKS)
In re: MAIN ST. CAPITAL 360 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14592 (JKS)
In re: MAIN ST. CAPITAL 360 LLC, Debtor.	Chapter 11 Case No. 22-14590 (JKS)
In re: MAIN ST. CAPITAL 360 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14594 (JKS)
In re: MANHATTAN AVENUE CAPITAL 1300 LLC, Debtor.	Chapter 11 Case No. 22-14596 (JKS)
In re: N. OCEAN CAPITAL 2929 B LLC, Debtor.	Chapter 11 Case No. 22-14597 (JKS)

In re: N. OCEAN CAPITAL 3565 B LLC, Debtor.	Chapter 11 Case No. 22-14601 (JKS)
In re: N. OCEAN CAPITAL 707 B LLC, Debtor.	Chapter 11 Case No. 22-14603 (JKS)
In re: N. OCEAN CAPITAL 344 LLC, Debtor.	Chapter 11 Case No. 22-14599 (JKS)
In re: N. OCEAN CAPITAL 707 LLC, Debtor.	Chapter 11 Case No. 22-14605 (JKS)
In re: NEWARK STREET CAPITAL 511-521 LLC, Debtor.	Chapter 11 Case No. 22-14607 (JKS)
In re: NJ MANAGER 1300, LLC, Debtor.	Chapter 11 Case No. 22-14609 (JKS)
In re: NORTH BERGEN CAPITAL 8709 LLC, Debtor.	Chapter 11 Case No. 22-14610 (JKS)

In re: NRIA 140 LUQUER MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14612 (JKS)
In re: NRIA 1ST AVENUE 301 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14614 (JKS)
In re: NRIA 2031 LOMBARD MANAGER, Debtor.	Chapter 11 Case No. 22-14616 (JKS)
In re: NRIA 2044 WEST FIRST CAPITAL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14618 (JKS)
In re: NRIA 2044 WEST FIRST CAPITAL MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14589 (JKS)
In re: NRIA 227 BERKELEY MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14591 (JKS)
In re: NRIA 279 SACKETT MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14593 (JKS)

In re: NRIA 3RD STREET CAPITAL 200-210 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14595 (JKS)
In re: NRIA 3RD STREET CAPITAL 200-210 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14598 (JKS)
In re: NRIA 3RD STREET CAPITAL 203-215 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14600 (JKS)
In re: NRIA 3RD STREET CAPITAL 203-215 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14602 (JKS)
In re: NRIA 423 THIRD MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14604 (JKS)
In re: NRIA 434 UNION MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14606 (JKS)
In re: NRIA 494 SEVENTH MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14608 (JKS)

In re: NRIA 51ST STREET 508 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14611 (JKS)
In re: NRIA 51ST STREET MANAGER 508 LLC, Debtor.	Chapter 11 Case No. 22-14613 (JKS)
In re: NRIA 52ND STREET 511-513 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14615 (JKS)
In re: NRIA 7TH STREET CAPITAL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14617 (JKS)
In re: NRIA BERGENLINE 4901 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14619 (JKS)
In re: NRIA BOND WAY CAPITAL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14620 (JKS)
In re: NRIA BRINY CAPITAL 305 MANAGER, LLC, Debtor.	Chapter 11 Case No. 22-14623 (JKS)

In re: NRIA BRINY CAPITAL 305 MEMBER, LLC, Debtor.	Chapter 11 Case No. 22-14625 (JKS)
In re: NRIA BROOKLYN I, LLC Debtor.	Chapter 11 Case No. 22-14627 (JKS)
In re: NRIA BROOKLYN II, LLC Debtor.	Chapter 11 Case No. 22-14629 (JKS)
In re: NRIA CHERRY STREET 113-27 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14621 (JKS)
In re: NRIA DELRAY 1 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14622 (JKS)
In re: NRIA DENERY LANE CAPITAL 837 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14624 (JKS)
In re: NRIA EB5 1300 MANHATTAN FUND LLC, Debtor.	Chapter 11 Case No. 22-14626 (JKS)

In re: NRIA EB5 4901 BERGENLINE FUND LLC, Debtor.	Chapter 11 Case No. 22-14628 (JKS)
In re: NRIA ELDEN DRIVE 1 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14630 (JKS)
In re: NRIA EXCHANGE, LLC Debtor.	Chapter 11 Case No. 22-14631 (JKS)
In re: NRIA FEDERAL HIGHWAY 318 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14632 (JKS)
In re: NRIA FL MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14633 (JKS)
In re: NRIA GULF STREAM VIEWS MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14635 (JKS)
In re: NRIA GUTTENBERG CAPITAL 416-22 69TH ST MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14637 (JKS)

In re: NRIA GUTTENBERG CAPITAL 416-22 69TH ST MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14639 (JKS)
In re: NRIA GUTTENBERG CAPITAL 6269 JV MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14641 (JKS)
In re: NRIA GUTTENBERG CAPITAL 6269 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14643 (JKS)
In re: NRIA HANOVER ROAD MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14645 (JKS)
In re: NRIA HENRY STREET 506 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14646 (JKS)
In re: NRIA II, Debtor.	Chapter 11 Case No. 22-14648 (JKS)
In re: NRIA KENWOOD RD 8 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14650 (JKS)

In re: NRIA MADISON STREET CAPITAL 931 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14651 (JKS)
In re: NRIA MANHATTAN AVENUE 1300 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14653 (JKS)
In re: NRIA N. OCEAN 2929 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14655 (JKS)
In re: NRIA N. OCEAN 344 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14634 (JKS)
In re: NRIA N. OCEAN 3565 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14636 (JKS)
In re: NRIA N. OCEAN 707 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14638 (JKS)
In re: NRIA NE 7TH MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14640 (JKS)

In re: NRIA NEWARK STREET CAPITAL 511 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14642 (JKS)
In re: NRIA NEWARK STREET CAPITAL 511-521 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14644 (JKS)
In re: NRIA NJ MANAGER 511 LLC, Debtor.	Chapter 11 Case No. 22-14647 (JKS)
In re: NRIA NJ MANAGER 8709 LLC, Debtor.	Chapter 11 Case No. 22-14649 (JKS)
In re: NRIA NJ MANAGER 931 LLC, Debtor.	Chapter 11 Case No. 22-14652 (JKS)
In re: NRIA NORTH BERGEN 8709 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14654 (JKS)
In re: NRIA OLD RIVER RD CAPITAL 460-510 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14656 (JKS)

In re: NRIA OLD RIVER RD CAPITAL 460-510 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14657 (JKS)
In re: NRIA OLD WOODS ROAD MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14658 (JKS)
In re: NRIA PARTNERS PORTFOLIO FUND I, LLC, Debtor.	Chapter 11 Case No. 22-14540 (JKS)
In re: NRIA SOUTH CHRISTOPHER COLUMBUS 1499 MANAGER LLC, Debtor.	Chapter 11 Case No. 22-14659 (JKS)
In re: NRIA STRUCTURED CREDIT STRATEGIES LLC, Debtor.	Chapter 11 Case No. 22-14660 (JKS)
In re: NRIA WRIGHT BY THE SEA 1901 MEMBER LLC, Debtor.	Chapter 11 Case No. 22-14661 (JKS)

In re: OLD RIVER ROAD CAPITAL 460-510 LLC, Debtor.	Chapter 11 Case No. 22-14662 (JKS)
In re: OLD WOODS ROAD CAPITAL 36 LLC, Debtor.	Chapter 11 Case No. 22-14663 (JKS)
In re: SACKETT STREET CAPITAL 279 LLC, Debtor.	Chapter 11 Case No. 22-14664 (JKS)
In re: SEVENTH STREET CAPITAL 494 LLC, Debtor.	Chapter 11 Case No. 22-14665 (JKS)
In re: SOUTH CHRISTOPHER COLUMBUS CAPITAL 1499 LLC, Debtor.	Chapter 11 Case No. 22-14667 (JKS)
In re: SUMMIT STREET CAPITAL 143 LLC, Debtor.	Chapter 11 Case No. 22-14668 (JKS)
In re: THIRD STREET CAPITAL 423 LLC, Debtor.	Chapter 11 Case No. 22-14669 (JKS)

In re: UNION STREET CAPITAL 434 LLC, Debtor.	Chapter 11 Case No. 22-14670 (JKS)
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In re: WEB MARKETING ASSOCIATES LLC, Debtor.	Chapter 11 Case No. 22-14671 (JKS)
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In re: WRIGHT BY THE SEA 1901, LLC Debtor.	Chapter 11 Case No. 22-14672 (JKS)
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**ORDER (A) DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES
AND (B) GRANTING RELATED RELIEF**

The relief set forth on the following pages, numbered two (2) through and including four (4), is hereby **ORDERED**.

Page: 2
Debtor: National Realty Investment Advisors, LLC, *et al.*
Case No.: 22-14539 (JKS)
Caption: Order (A) Directing Joint Administration of Chapter 11 Cases and (B) Granting Related Relief

Upon the motion (the “**Motion**”)¹ of the above-captioned debtors and debtors in possession (the “**Debtors**”) for entry of an order (this “**Order**”) (a) directing the joint administration of the Debtors’ chapter 11 cases for procedural purposes only, and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, entered on July 23, 1984, as amended on September 18, 2012 (Simandle, C.J.); and this Court having the power to enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “**Hearing**”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED**

THAT:

1. The Motion is GRANTED as set forth in this order.
2. The above-captioned Chapter 11 Cases are consolidated for procedural purposes only and shall be jointly administered under Case No. 22-14539 (JKS).

¹ Capitalized terms not otherwise defined shall have the meanings ascribed to such terms in the Motion.

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Debtor: National Realty Investment Advisors, LLC, *et al.*
Case No.: 22-14539 (JKS)
Caption: Order (A) Directing Joint Administration of Chapter 11 Cases and (B) Granting Related Relief

3. The Clerk of the Court shall maintain one file and one docket for these jointly administered cases, which file and docket shall be the file and docket for National Realty Investment Advisors, LLC, Case No. 22-14539.

4. The caption of the jointly administered cases shall read as follows:

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 22-14539 (JKS)

(Jointly Administered)

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

5. All pleadings and other papers filed in the jointly administered Chapter 11 Cases shall bear the foregoing consolidated caption.

6. The foregoing consolidated caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n).

7. A docket entry shall be entered in each of the above-captioned Chapter 11 Cases substantially as follows:

An order has been entered in this case consolidating this case with the case of National Realty Investment Advisors, LLC (Case No. 22-14539 (JKS)) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The docket in Case No. 22-14539 (JKS) should be consulted for all matters affecting this case.

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Debtor: National Realty Investment Advisors, LLC, *et al.*

Case No.: 22-14539 (JKS)

Caption: Order (A) Directing Joint Administration of Chapter 11 Cases and (B) Granting Related Relief

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the Debtors or the Debtors' estates.

9. The Debtors are authorized to utilize a combined service list for the Debtors' jointly-administered cases and may send combined notices to creditors of the Debtors and other parties in interest where appropriate.

10. The Debtors and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

11. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014 or otherwise, this Order shall be immediately effective and enforceable upon its entry.

12. The Debtors are authorized to file a single consolidated list of the 30 largest creditors in each of the Chapter 11 Cases.

13. The requirements set forth in D.N.J. LBR 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

14. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rules and the Local Rules are satisfied by such notice.

15. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.